UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

HENRY NARANJO and MARLENE RAMIREZ.

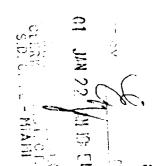
CASE NO.: 00-6022-CIV-LENARD MAGISTRATE: JUDGE TURNOFF

Plaintiffs,

Vs.

STEPHEN BYRONS SMITH and PALMER JOHNSON, INC.

Defendants.



PLAINTIFFS' RE-NOTICE OF TAKING DEPOSITION DUCE TECUM

TO: F. David Famulari, Esq.

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TAKE NOTICE that the undersigned attorneys will take the deposition of:

Name & Address: Corporate Representative(s) and/or Records Custodian of

Bradford Marine, Inc. with the most knowledge as to the following documents and areas of inquiry listed below

Date & Time : Thursday, February 8, 2001 at 1:00 p.m.

Place : RIVKIND & PEDRAZA, P.A.

Sixth Floor, Concord Building

66 West Flagler Street Miami, Florida 33130

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Pursuant to Rule 30, Federal Rules of Civil Procedure, the witness is requested to bring with him/her or produce at this deposition the following described material, documents, and records:

Areas of inquiry and documents Deponent(s) is/are to bring to said deposition are as follows:

- 1. All documents reflecting any and all repairs, modifications, alterations, changes, change orders and maintenance of the motor yacht SOUVENIR before the explosion of July 1997.
- 2. All documents reflecting any and all repairs, modifications, alterations, structural changes, cosmetic changes, change orders and maintenance of the motor yacht SOUVENIR after the explosion of July 1997.
- 3. All documents reflecting any and all repairs, modifications, alterations, structural changes, cosmetic changes, change orders and maintenance of the motor yacht SOUVENIR as a result of the explosion of July 1997.
- 4. All gas free certificates for the motor yacht SOUVENIR.
- 5. All diagrams, sketches, blueprints, schemetics naval architect prints, plans, elevation plans, wiring plans, bilge plans, exhaust system plans, fuel system plans and all other documents depicting the motor yacht and its structure for both before and after the explosion.
- 6. All repairs, alterations and maintenance records for the motor yacht SOUVENIR.
- 7. All contracts for repairs, alterations and maintenance, all bills, invoices, parts inventories, materials used inventory for the motor yacht SOUVENIR.
- 8. The cause of explosion and all actions taken to prevent said explosion.
- 9. All actions taken and work done prior to the explosion on the motor yacht SOUVENIR.
- Any and all documents, photographs, videos, etc. responsive to the Request for 10. Production directed to Bradford Marine, and attached to the October 23, 2000 directed to Shawn B. McKamey, Esq., counsel for Bradford Marine.
- 11. Legible copies of all invoices, parts, inventories, letters, faxes, instructions, labor inventories, purchase inventories, material inventories, work orders, invoices, bills for serves rendered and work performed, work proposals, change orders.

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Captain's instructions, blue prints, sketches, drawings for all work performed as they pertain to Stephen Byron Smith and/or the motor yacht SOUVENIR formerly KEVALI, account number #02847, including all photographs.

12. Produce legible complete copies of employee, Henry Naranjo, file and files containing payroll records and earnings while employed at Bradford Marine.

Upon oral examination pursuant to Rule 30, Federal Rules of Civil Procedure, before Mocega & Associates, court reporters, or any other Notary Public or officer authorized by law to take depositions in the State of Florida. The oral examination will be recorded stenographically and continue from day to day until completed. The deposition will be taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure.

Respectfully Submitted,

RIVKIND & PEDRAZA, P.A. Attorneys for Plaintiffs Concord Building, Sixth Floor 66 West Flagler Street Miami, Florida 33130 Telephone: (305) 374-0565

y: Manuel Valle 180

Fla. Bar No.: 13307

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed on this 17 day of January, 2001 to all the above named attorneys on record.

RIVKIND & PEDRAZA, P.A. Attorneys for Plaintiffs Concord Building, Sixth Floor 66 West Flagler Street Miami, Florida 33130

Telephone: (305) 374-0565 Facsimile: (305) 539-8341

MANUEL VALDES, ESO

Fla. Bar No.: 13307

cc: Mocega & Associates

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